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**FEDERAL ON-SCENE COORDINATOR'S REPORT
FOR
MIDWEST BODY CORPORATION
PARIS, EDGAR COUNTY, ILLINOIS
TDD: S05-9809-014
PAN: 8P1401RAXX**

April 27, 1999

Prepared for:

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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Executive Summary

SITE: Midwest Body Corporation

LOCATION: 2109 South Central Avenue
Paris, Edgar County, Illinois

PROJECT DATES: September 29, 1998 to November 13, 1998

INCIDENT DESCRIPTION: The site, which is not listed on the NPL, is an inactive manufacturing facility. Midwest Body Corporation began operations in 1908, manufacturing street sweepers and cars. After World War II, the company produced specialized truck bodies. The company generated paint waste, paint sludge, and waste oil. During the course of operations, the company buried an estimated 1,000 to 2,000 cubic yards of paint material in six discrete areas on site and buried containers in two locations on site. After production ceased and the plant closed in July 1993, several former employees were interviewed by the Illinois State Police. The employees alleged that on more than one occasion from 1977 to 1980, drums containing waste were buried on site. Illinois Environmental Protection Agency (IEPA) along with their contractor Graef, Anhalt, & Schloemer (GAS), conducted a Remedial Investigation (RI) of the site from July through October 1996. GAS performed a geophysical electromagnetic (GEM) survey and sampled soil, groundwater, and sludge from machine pits and sumps in the main building. One hundred thirty-five test pits were excavated on site to locate buried drums, paint waste, and other evidence of contamination. The waste was similar in color, texture, and appearance, and in certain areas exposed to the surface. GAS estimated a total of 1,000 to 2,000 cubic yards of paint waste were buried on site. Analytical results of waste samples indicated elevated concentrations of lead, barium, toluene, xylene, and ethylbenzene. Four monitoring wells and three well nests (with 2 wells each, each screened at different intervals) were installed to detect groundwater flow and contamination. IEPA documented that groundwater contamination has already occurred on site. Magnesium, barium, chromium, lead, and iron exceeded both Class one and Class two Illinois Tiered Approach to Cleanup Objectives (TACO) for groundwater. The City of Paris is supplied drinking water through a municipal water supply, and the effects of groundwater contamination have not been fully assessed. No potentially responsible party (PRP) was found financially viable to undertake a full cleanup of the site.

ACTIONS: On October 16, 1997, United States Environmental Protection Agency (U.S. EPA) with the Superfund Technical Assessment and Response Team (START) contractor, Ecology and Environment, Inc. (E & E), investigated the site. A site inspection, site assessment, and site tour were conducted with representatives from the City of Paris. Analytical results of samples taken during the visit indicated elevated concentrations of arsenic, barium, cadmium, chromium, and lead. Through a brownfields renovation agreement with U.S. EPA, IEPA, the City of Paris, and the Robert Morgan Company, the site property was divided into two distinct sections. The portion of the site which included the paint and drum burial pits and the aboveground storage tanks was the area of concern for the removal action. Due to the chemical hazards on site, the unrestricted access to the property, and the proximity to residential areas, the site was classified a time-critical removal action.

On September 29, 1998, U.S. EPA, START, and the U.S. EPA Emergency and Rapid Response Services (ERRS) contractor, Earth Tech, Inc., mobilized to the site. ERRS began to excavate waste material on October 1, 1998. The waste was readily seen as veins of paint material in the contaminated soil and was generally found above the natural clay layer. Once excavated, material was segregated into two categories, contaminated and non-contaminated. A rubber tire loader was used to transport the contaminated material from the excavation pit to a staging area, which was surrounded by an earthen berm. Non-contaminated material was staged near the excavation pit to be used as backfill material. Buried drums were excavated and staged on a poly liner on the northwest corner of the concrete drive. The drums contained solidified and gelatinous paint waste and earthen material. The drums were crushed and added to the contaminated material staged in the earthen berm. A hazardous and nonhazardous waste stream was setup for the excavated material. USL City Environmental, Inc., of Detroit, Michigan, was chosen to dispose both the hazardous and nonhazardous waste streams. The waste was transported via railway to the USL City Environmental facility.

During the removal, a total of 80 test pits were dug on site in areas of suspected contamination or extending radially from excavation pits. ERRS visually screened the test pits and START screened the test pits for organic vapors with a photoionization detector. If paint waste was discovered, the contaminated material was placed in the earthen berm. When OSC Turner, ERRS, and START were assured contaminated material was not present, excavation activities around the pit ceased. START provided continuous air monitoring and completed sampling activities. START sampled the excavation pits to ensure cleanup criteria were met. Organic vapor and dust levels around the perimeter of the site remained at background levels during the course of the project.

Waste removal from the site began on October 28, 1998, and was completed on November 6, 1998. A total of 3,990 tons of waste material (2,565 tons nonhazardous waste, 1,425 tons of hazardous waste) were transported for disposal at USL City Environmental, Inc. The excavation pits were backfilled with material located on site and fill material procured through an outside source. Residual waste material, in the form of fingernail size pieces of paint, may remain in isolated locations of the property. Removal of all paint material was not economically viable, and the risks associated with the residual waste remains low.

Kevin Turner, OSC
U.S. EPA, Region 5

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**Emergency and Enforcement Response Branch
Office of Superfund, U.S. EPA, Region V
OSC Report Standard Appendices List**

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Site ID#: B530
Contract #: 68-S5-98-02
Delivery Order #: 006

1. Operational Files	<u>ID#</u>
- Action Memos/Additional Funding	1-A
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- Hot Zone Entry/Exit Log	1-D
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- Daily Work Orders	1-I
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2. Financial Files	<u>ID#</u>
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- START Technical Direction Documents	2-B
- Daily Cost Reporting US EPA Form 1900-55's	2-C
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- RCMS Cost Estimates	2-E
- Subcontractor Bid Sheets	2-F
- START Cost Documentation	2-G
- Other: _____	2-H
3. Technical Files	<u>ID#</u>
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- * Portions of these OSC Report Appendices may contain confidential business information or enforcement-sensitive information and must be reviewed by the Office of Regional Counsel prior to release to the public.

I. SUMMARY OF EVENTS

A. Site Conditions and Background

1. Initial Situation

The Midwest Body Corporation (MBC) site, which is not listed on the National Priorities List (NPL), is an inactive manufacturing facility. Midwest Body Corporation began operations in 1908, manufacturing street sweepers and street cars. After World War II, the company produced specialized truck bodies. In July 1993, production ceased and the plant closed. Plant operations over the years included parts stamping and cutting, welding, parts washing, wood treatment, painting, and equipment repair and maintenance. Operations generated the following waste streams: hazardous paint waste (enamel paint residues mixed with xylenes); nonhazardous paint sludges (from water-based paints); used paint booth air filters; water-soluble parts washer rinsewaters; welding cooler water; and waste oil (from equipment maintenance).

The MBC site is located at 2109 South Central Avenue, in the City of Paris, Edgar County, Illinois (Attachment A, Figure 1). The geographical coordinates for the site are latitude 39°35'37.6" North, longitude 87°41'55.2" West. The original 22.3-acre site consists of a 274,000-square-foot abandoned building, two small pump houses, several aboveground storage tanks, and a water tower (Attachment A, Figure 2). Through a brownfields renovation agreement with the United States Environmental Protection Agency (U.S. EPA), the Illinois Environmental Protection Agency (IEPA), the City of Paris, and the Robert Morgan Company, the site property was divided into two distinct sections. The section west of the manufacturing building, which included Areas A, B, C and the aboveground storage tank (AST) Area, was the area of concern for the removal action. The other section will be maintained by the Robert Morgan Company. The site is situated in a light industrial and residential area. Farmland borders the site to the southwest; Cadillac Products Inc. lies to the southeast; Central Avenue, Bell & Bell Demolition Co., and Moss Grain Co. lie to the east; an alley and a residential area lie to the north of the site; and Foley Lumber borders the site to the west. An active Pennsylvania Central Railroad spur enters the property and services two neighboring businesses. There is a fence around the property; however, there is unrestricted access where the railroad spur enters.

After the plant closed, several former employees were interviewed by the Illinois State Police. The employees alleged that on more than one occasion from 1977 to 1980, drums containing waste lead paint, paint thinner waste, paint sludge, and paint filters were buried in an area west of the loading dock doors in the west part of the property. In April 1995, the City of Paris served a notice of a "complaint of nuisance" against the site owner. IEPA along with their contractor, Graef, Anhalt, & Schloemer (GAS), conducted a Remedial Investigation (RI) of the site from July through October 1996. GAS performed a geophysical electromagnetic (GEM) survey and sampled soil, groundwater, and sludge from machine pits and sumps in the main building. One hundred thirty-five test pits were excavated on site to locate buried drums, paint waste,

and other evidence of contamination. GAS located paint waste in five discrete areas on site and drums/containers in two locations. The buried paint waste was similar in color, texture, and appearance. Analytical results of waste samples indicated elevated concentrations of lead, barium, toluene, xylene, and ethylbenzene. A total of ten monitoring wells were installed to detect groundwater flow and contamination. IEPA documented that groundwater contamination has already occurred on site. Magnesium, barium, chromium, lead, and iron exceeded both Class one and Class two Illinois Tiered Approach to Cleanup Objectives (TACO) for groundwater. The City of Paris is supplied drinking water through a municipal water supply, and the effects of groundwater contamination have not been fully assessed.

On October 16, 1997, U.S. EPA representatives On-Scene Coordinator (OSC) Kevin Turner and Jim Van Derkloot, Superfund Technical Assessment and Response Team (START) member Michelle Cullerton, along with representatives from IEPA and the City of Paris, conducted a site assessment. Five soil samples were collected; four consisted of paint material and one was a dirt sample from the floor of the building. Analytical results indicated that one paint sample was considered a Resource Conservation and Recovery Act (RCRA) hazardous waste due to a toxic characteristic leaching procedure (TCLP) lead concentration above the regulatory limit of 5.0 milligrams per liter (mg/L) (40 Code of Federal Regulations [CFR] 261.24). Arsenic, barium, cadmium, and chromium were also detected in the paint samples. OSC Turner found paint waste on the ground surface which could come in direct contact with trespassers or wildlife. Due to the chemical hazards on site, the unrestricted access to the property, and the proximity to residential areas, the site was classified a time-critical removal action.

2. Location of hazardous substance(s)

Buried paint waste was found in six discrete areas on site during the removal action, including one location in Area A; two locations in Area B; two locations in Area C; and one location in Area E (Attachment A, Figure 3). GAS located buried paint waste in five areas on site, and an additional area was located during the removal through a discussion with a local resident. GAS estimated a total of 1,000 to 2,000 cubic yards of paint waste was buried on site. During the removal, paint waste was detected at depths of up to 8 feet below ground surface. The paint waste was similar in nature, consisting of mixed red and blue/grey paint. Drum and containers were removed from two locations on site (one location in Area B; one location in Area C). Sixty-five 55-gallon drums and fifteen 5-gallon containers were found in two locations on site. The drums were severely deteriorated and contained solidified or gelatinous paint, and earthen material. During the course of the removal action, waste material was staged inside an earthen berm located south of the concrete drive.

3. Cause of the release or discharge

The release of hazardous substances at the MBC site was from the deliberate burial of wastes. Waste was buried in unlined pits and found at the surface and below the surface. Waste was exposed to groundwater, surface water, and air.

Buried drums, over time, were exposed to varying seasonal temperatures (freeze/thaw), rain, and snowmelt. These weather conditions resulted in further deterioration of the drums and allowed for the continued release of hazardous wastes described herein to the surrounding soil and groundwater.

4. Efforts to locate and obtain response by responsible parties

U.S. EPA is investigating the Midwest Body Corporation and may initiate cost recovery actions.

B. Organization of the Response

The U.S. EPA removal action began on September 29, 1998. The removal action was conducted in four phases: site setup; waste excavation and sampling; removal and disposal of waste; and pit backfilling and site demobilization.

Under Contract Number 68-S5-98-02, Delivery Order 006, removal activities were conducted by the U.S. EPA Emergency and Rapid Response Services (ERRS) contractor, Earth Tech, Incorporated (Earth Tech). The actions described in this report were performed by U.S. EPA under authority and funding of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) and were completed on November 13, 1998. Attachment B, Table 1 outlines the agencies or parties which provided response, assessment or disposal assistance, and the action(s) and roles each served during the MBC removal action.

C. Injury or Possible Injury to Natural Resources

1. Content and time of notice to natural resource trustees

No formal notification has been issued to IEPA or other organizations regarding the status of possible natural resource damage at the MBC site. IEPA had conducted several previous investigations of the site, and was periodically updated about the progress of the U.S. EPA removal action. IEPA is aware of the current conditions at the site.

2. Trustee damage assessment and restoration activities

No formal damage assessment has been conducted.

D. Chronological Narrative of Removal Activities

1. Threat abatement actions taken

The removal action at the MBC site was conducted under the authority of CERCLA Section 104(a). IEPA conducted a thorough RI at the site from July through October 1996. U.S. EPA also conducted a site assessment, supported by START, and accompanied by representatives from the City of Paris, on October 16, 1997.

Under signature of U.S. EPA, the City of Paris, IEPA, and the Robert Morgan Company, the original MBC site was divided into two sections. The east section that contained the site buildings will be maintained by the Robert Morgan Company, while the west section of the site became the area of interest for U.S. EPA removal activities.

On April 9, 1998, U.S. EPA Emergency Response Branch (ERB) approved the expenditure of up to \$1.429 million dollars to complete a removal action at the MBC site. The removal action was undertaken to mitigate a threat to public health and the environment, and to aid the City of Paris with plans to redevelop the site by excavating buried paint waste and drums. U.S. EPA mobilized ERRS under Contract Number 68-S5-98-02, Delivery Order 006, and START under Technical Direction Document S05-9809-014.

On September 24, 1998, U.S. EPA OSC Kevin Turner, START member Paul Atkociunas, and Earth Tech Response Manager Bret Vanness conducted a site reconnaissance to discuss removal strategies and mobilizing personnel and equipment. OSC Turner briefed the Robert Morgan Company representatives on planned removal activities at the site.

On September 29, 1998, U.S. EPA, ERRS, and START mobilized to the site to initiate removal activities (phase one). Between September 30, 1998, and October 2, 1998, Earth Tech established a command post, support zone, secured the site, prepared for removal activities, prepared a site safety plan, and began to excavate buried paint waste (phase two). The support zone encompassed the AST area and consisted of an office trailer and a storage trailer. Temporary electricity and telephone lines were established. The decontamination area was set up in the northwest corner of the main building near the entrance. The decontamination area included an emergency eyewash; boot, respirator, and hand wash stations; and an equipment drop station. A first aid station was staged in the command post. Earth Tech constructed an earthen berm, which was used to stage contaminated material, south of the concrete drive in Area B.

At the time of the removal action, the site was not completely secured from the public; Area E was accessible from Alexander Street and the site was accessible from an opening in the fence where the railroad spur enters the site. No additional fencing was erected. Snow fencing was used to secure the excavation pit in Area E, while pits in the other areas were later secured with posts and caution tape. The main gate was secured and locked.

Between October 1 and October 2, 1998, Earth Tech began excavation activities using an excavator to remove buried waste material. The waste was readily seen as veins of paint material in the soil and was generally found above the natural clay layer. Once excavated, material was segregated into two categories, contaminated and non-contaminated. Non-contaminated material was staged near the excavation pit to be used as backfill material. ERRS visually screened the non-contaminated piles, removed paint waste when present, and then placed the paint waste material into the contaminated pile. START screened the non-contaminated pile with a photoionization detector (PID) to determine if volatile organic compounds (VOCs) were present.

Excavation activities for each pit began in level C personal protective equipment (PPE) with air monitoring to confirm levels of VOCs and dust. If levels of organic vapors and dust were below action levels for level C, the level of protection was downgraded to level D PPE. A miniram aerosol monitor was used to monitor dust levels during excavation activities. Excavation began at the main excavation pit in Area B. Buried drums were excavated and staged on a poly liner on the northwest corner of the concrete drive. The drums were severely deteriorated and contained solidified and gelatinous paint waste and earthen material. PID readings collected within two inches of the paint material ranged from 0 to 60 parts per million (ppm) of organic vapors. Over the course of the removal action a total of sixty-five 55-gallon drums and fifteen 5-gallon containers were excavated from the site. Excavation activities continued through November 4, 1998. The excavation pits were larger than or roughly match the delineation as detailed in the GAS RI report, however, an additional area of contamination was located through a discussion with a local resident. Organic vapor and dust levels around the perimeter of the site remained at background levels during the course of the project. A detailed log of air monitoring results can be found in the site file.

Between October 5 and October 10, 1998, Earth Tech continued soil excavation activities on site. On October 5, excavation continued in level D protection based upon air monitoring results of the breathing zone. Earth Tech excavated contaminated soil and drums from the main excavation pit in Area B. Earth Tech also began excavating the excavation pit south of the north fence in Area B and staged the contaminated waste material inside the earthen berm. The pile of contaminated material contained in the earthen berm was relatively homogeneous due to the consistency of the paint waste and method of excavation. The waste pile consisted of soil with small- to medium-sized pieces of solidified paint material. On October 7, 1998, representatives from seven disposal companies attended a bidders conference for the disposal of material located on site.

On October 9, 1998, START began soil sampling activities. Sample locations are located in Attachment A, Figure 4. Attachment B, Table 2 describes sample locations, sampling techniques and dates sampled. Samples P01 through P05 were collected from material staged in the earthen berm. START documented sample descriptions, completed sample labels, and filled out U.S. EPA chain of custody forms. The samples were placed on ice and shipped to American Environmental Analytical (AEA) Laboratories in Chicago, Illinois. The samples were analyzed for total and TCLP RCRA metals plus copper and zinc, total and TCLP VOCs, total and TCLP semivolatile organic compounds (SVOCs), pH, flash point, and the paint filter test with 3-day turnaround time specified by OSC Turner. The total VOC samples were collected using the Encore sampling method, which offers a lower detection limit than U.S. EPA analytical method 8260. START also collected a composite sample (F01) of earthen material located on site which was used as backfill material. Sampling activities were completed on October 20, 1998. Analytical results for soil sampling activities are summarized in Attachment B, Tables 3 and 4.

Between October 12 and October 16, 1998, Earth Tech continued excavation activities. Earth Tech began to excavate contaminated material and drums from the two areas of contamination in Area C and began to excavate contaminated material from Area E. On October 16, 1998, disposal of the contaminated soil was awarded to USL City Environmental, Inc., of Detroit, Michigan. The contaminated material was profiled as a hazardous waste solid based upon TCLP lead concentrations from the October 16, 1997, site visit. The waste was later loaded into gondola rail cars and transported via railway to the USL City Environmental facility.

On October 13, and October 16, 1998, START performed soil sampling of the excavation pits in Area B and Area C to determine if the cleanup criteria had been met. In Area B, the main excavation pit (samples PM-01 and PM-02) and the pit south of the north fence (samples PN-01, PN-02, and PN-03) were sampled on October 13. In Area C, the excavation pit north of the south fence (sample PS-01) and the pit south of the railroad tracks (sample PR-01) were sampled on October 16. The samples were analyzed for total and TCLP RCRA metals, total and TCLP VOCs, and total and TCLP SVOCs.

Between October 19 and October 23, 1998, Earth Tech continued excavation activities in Area E. Earth Tech constructed a loading ramp, which was used to load contaminated waste material into the rail cars. Earth Tech crushed the staged drums inside the earthen berm into 3-foot by 3-foot square pieces. The crushed drums were added to the contaminated waste material in the earthen berm. Earth Tech also began to dig confirmation test pits to confirm the extent of contamination. Test pits were dug 1 to 2 feet into the clay layer, with the pits varying in depth from 4 to 10 feet below the surface. During the removal, a total of 80 test pits were dug on site in areas of suspected contamination or extending radially from excavation pits. ERRS visually screened the test pits and START screened the test pits with a PID. If paint waste was discovered, the contaminated material was placed in the earthen berm. When OSC Turner, ERRS, and START were assured contaminated material was not present excavation activities around the pit ceased.

On October 20, 1998, AEA Laboratories submitted the analytical information on the soil samples collected on October 9, 1998. The results indicated that one sample contained a TCLP lead concentration above the regulatory limit. Sample W-02, from the west half of the waste pile, contained paint waste, which was not indicative of the composition of the waste pile. The pile primarily contained soil intermixed with paint waste. Based upon this information a nonhazardous wastestream was also generated for the site. USL City Environmental, Inc., of Detroit, Michigan was chosen to dispose both the hazardous and nonhazardous waste streams.

On October 20, 1998, START collected a soil sample PE-01 from the excavation pit in Area E to determine if cleanup criteria have been met. The sample was analyzed for total and TCLP RCRA metals, total and TCLP VOCs, and total and TCLP SVOCs.

Between October 26 and October 31, 1998, Earth Tech lined gondola rail cars and filled them with contaminated material. A total of 24 cars were shipped during the

week; 11 were identified as hazardous, and 13 were nonhazardous (phase three). Each car was estimated to contain 95 tons of material. Earth Tech, START, and U.S. EPA determined the designation of hazardous and nonhazardous rail cars and manifested them accordingly. USL City Environmental performed quality assurance (QA) to ensure that wastes in cars were identified correctly. An additional area of contamination north of the concrete drive in Area B was discovered through a discussion with a local resident. The area was excavated and test pits were dug to confirm the extent of contamination.

On October 27, 1998, AEA Laboratories submitted analytical results from samples taken on October 13, 1998. Analytical results of the soil samples taken from excavation pits were below action levels. However, analytical results from the main excavation pit indicated sample PM-02 contained 459 milligram per kilogram (mg/kg) of total lead. TCLP results for sample PM-02 contained 0.418 mg/L of lead, which is below the regulatory level of 5.0 mg/L. Earth Tech continued to excavate material from the pit to ensure clean up. On October 30, 1998, Earth Tech began to backfill the excavation pit in Area E and the excavation pit south of the north fence in Area B with clean backfill material located on site.

On October 27 and 28, 1998, START sampled the 10 monitoring wells on site. Attachment A, Figure 5, identifies the location of the monitoring wells, and Attachment B, Table 5, describes the sample locations. For groundwater sampling, all monitoring wells were hand-bailed and sampled using dedicated polyethylene bailers to eliminate cross-contamination. The wells were purged prior to sampling of 1 to 3 times the well volume, depending on the recharge rate. Samples were collected within the screen interval. All water samples were decanted from the bailers directly into appropriate laboratory containers that contained the proper preservatives. After sampling, the containers were immediately placed on ice within a cooler. After the sampling activities were completed, samples were prepared for shipment, and sent to AEA Laboratories. The samples were analyzed for Target Compound List (TCL) SVOCs, pH, total cyanide, total sulfide, TCL VOCs, and Target Analyte List (TAL) metals. This analysis corresponds with IEPA's sampling analyses during their RI. Analytical results are summarized in Attachment B, Table 6.

Between November 2 and November 6, 1998, Earth Tech continued loading rail cars with contaminated waste material staged in the earthen berm. A total of 18 cars were shipped off site during the week; four contained hazardous waste, fourteen contained nonhazardous waste. Earth Tech procured additional backfill material from an outside source. A total of 1,186.25 tons of backfill material were delivered to the site, of which 1121.35 tons were used to backfill excavation pits, while 64.9 tons remained staged in Area E. The City of Paris will use the staged material to level Area E after weather events compact the backfilled soil. During the week, several heavy rain events hindered backfilling activities. On November 5, Earth Tech pumped water from the excavation pits into a ditch south of the railroad tracks. The pumped water remained on the property and did not flood adjacent properties.

On November 5, 1998, START placed identical locks on the groundwater monitoring wells. On November 6, 1998, START and ERRS inspected the contents of the three ASTs located on site. The horizontal tank, Tank #1 (Attachment A, Figure 1), contained a residual amount of dark liquid, PID readings from a sample collected indicated a concentration of 21 ppm of organic vapors. Tank #2 contained a residual amount of a viscous amber-colored liquid, PID readings from a sample collected indicated 0.4 ppm of organic vapors. The liquid samples were returned to their respective tanks. Tank #3 was empty.

Between November 9 and November 13, 1998, Earth Tech completed backfilling activities and the site was demobilized. On November 11, 1998, U.S. EPA, START, and the ERRS Project Manager and excavation crew demobilized from the site. The rubber tire loader and excavator were decontaminated by the Paris Fire Department. The electricity and phone lines were disconnected and the trailers were removed. ERRS Field Cost Administrator and equipment were demobilized from the site by November 13, 1998.

2. Treatment, disposal, or alternative technology approaches pursued

A total of 3,990 tons of waste material (2,565 tons nonhazardous waste, 1,425 tons of hazardous waste) were transported for disposal to USL City Environmental, Inc., of Detroit, Michigan. The hazardous waste was treated and then landfilled while the non-hazardous waste was landfilled. A waste disposal summary is included in Attachment B, Table 7.

3. Public information and community relations activities

On October 7, 1998, OSC Turner met with Suzanne Averetti with the Paris Beacon News to discuss a newspaper article about the site. OSC Turner coordinated site activities with Hermann Taylor, Chief of the Paris Fire Department, and Tom Boren, Chief of the Paris Police Department. On November 10, 1998, OSC Turner attended a City Council meeting to discuss site activities. U.S. EPA provided the City of Paris with additional backfill material which will be used to level the backfilled pits in Area E. Hermann Taylor received POLREPs.

E. Resources Committed

Extramural Costs:

Total Cleanup Contractor (e.g, ERRS) Costs	\$595,000
START	\$20,000
TOTAL, EXTRAMURAL COSTS	\$615,000

Intramural Costs:

Direct Costs (Region, HQ, ERT)	\$12,500
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Intramural Indirect Costs	\$0
TOTAL, INTRAMURAL COSTS	\$12,500
TOTAL SITE COST	<u>\$627,500</u>
Project Ceiling	\$1,429,710

Any indication of specific costs incurred at the site is only an approximation, subject to audit and final definization by U.S. EPA. The OSC Report is not meant to be a final reconciliation of costs associated with a particular site.

II. EFFECTIVENESS OF REMOVAL ACTIVITIES

A. Actions Taken by PRPs

No PRPs assisted with the removal actions.

B. Actions by State and Local Agencies

IEPA provided historical information on the site during the assessment phase of the removal action including a RI Report for the site. IEPA representatives spoke with OSC Turner regarding technical details of the removal activities. During the removal action, representatives from the City of Paris visited the site and spoke with OSC Turner regarding removal activities and site conditions. The City of Paris Fire Department provided pressurized water for the decontamination of the excavator and rubber tire loader.

C. Actions Taken by Federal Agencies and Special Teams

U.S. EPA provided monetary resources, overall response organization, and oversight during all removal activities conducted by ERRS.

D. Actions Taken by Contractors, Private Groups, and Volunteers

The U.S. EPA ERRS contractor, Earth Tech, conducted the removal of hazardous and nonhazardous waste materials at the MBC site. Earth Tech activities included excavating paint, drum waste, and contaminated soil, staging waste, and backfilling excavation areas. Earth Tech prepared a site-specific health and safety plan and arranged subcontractors to analyze samples and transport and dispose the wastes from the site. Earth Tech provided the personnel and equipment necessary to complete field operations. All health and safety protocols and safety and environmental laws, transportation regulations, and disposal requirements were followed during this removal activity.

Subcontractors for Earth Tech included: laboratory analysis by AEA Laboratories; final transportation and disposition of wastes by USL City Environmental; additional site personnel by On-Site Environmental; trailer rental by Williams Scotsman;

electrical service by CIPS; phone service by GTE; load wrappers by MHF Logistical Solutions, Inc.; backfill material by Kuhn Trucking Services; and sanitary disposal by McCalister & Sons.

U.S. EPA START contractor, E & E, provided continuous assistance in documenting on-site activities and costs incurred, conducted contractor oversight (both general and health and safety), completed air monitoring, conducted soil and groundwater sampling, and completed necessary reports.

The Robert Morgan Company assisted by providing supplies, such as pipe and railroad ties, which were used for ramp construction. The Robert Morgan Company also provided ERRS with the use of a fork lift.

III. DIFFICULTIES ENCOUNTERED

A. Items That Affected the Response

Transportation: Hidden costs of transportation by rail; purchasing poly liners specifically designed for rail cars was not anticipated. (43 liners at a cost of \$550 a piece). However, using rail cars provided a quick and efficient means of removing contaminated material off-site.

Laboratory: Difficulties with turnaround times interfered with the disposal of waste.

Weather: Heavy rain events during backfilling activities hindered proper compaction of fill material. The City of Paris will backfill the excavation pit in Area E with additional backfill material left on site.

B. Issues of Intergovernmental Coordination

Not applicable.

C. Difficulties Interpreting, Complying With, or Implementing Policies and Regulations

Not applicable.

IV. RECOMMENDATIONS FOR NEW POLICY OR REGULATIONS, AND CHANGES IN CURRENT REGULATIONS AND RESPONSE PLANS

A. Means to Prevent a Recurrence of the Discharge or Release

Routine audits: Audits should be conducted routinely for companies that are producers or users of large quantities of hazardous substances, and these companies should be required to dispose of wastes produced and materials used. Companies that fall into these categories could be required to carry and maintain liability insurance to pay for potential environmental damage or threats that result from operations.

B. Means to Improve Removal Activities

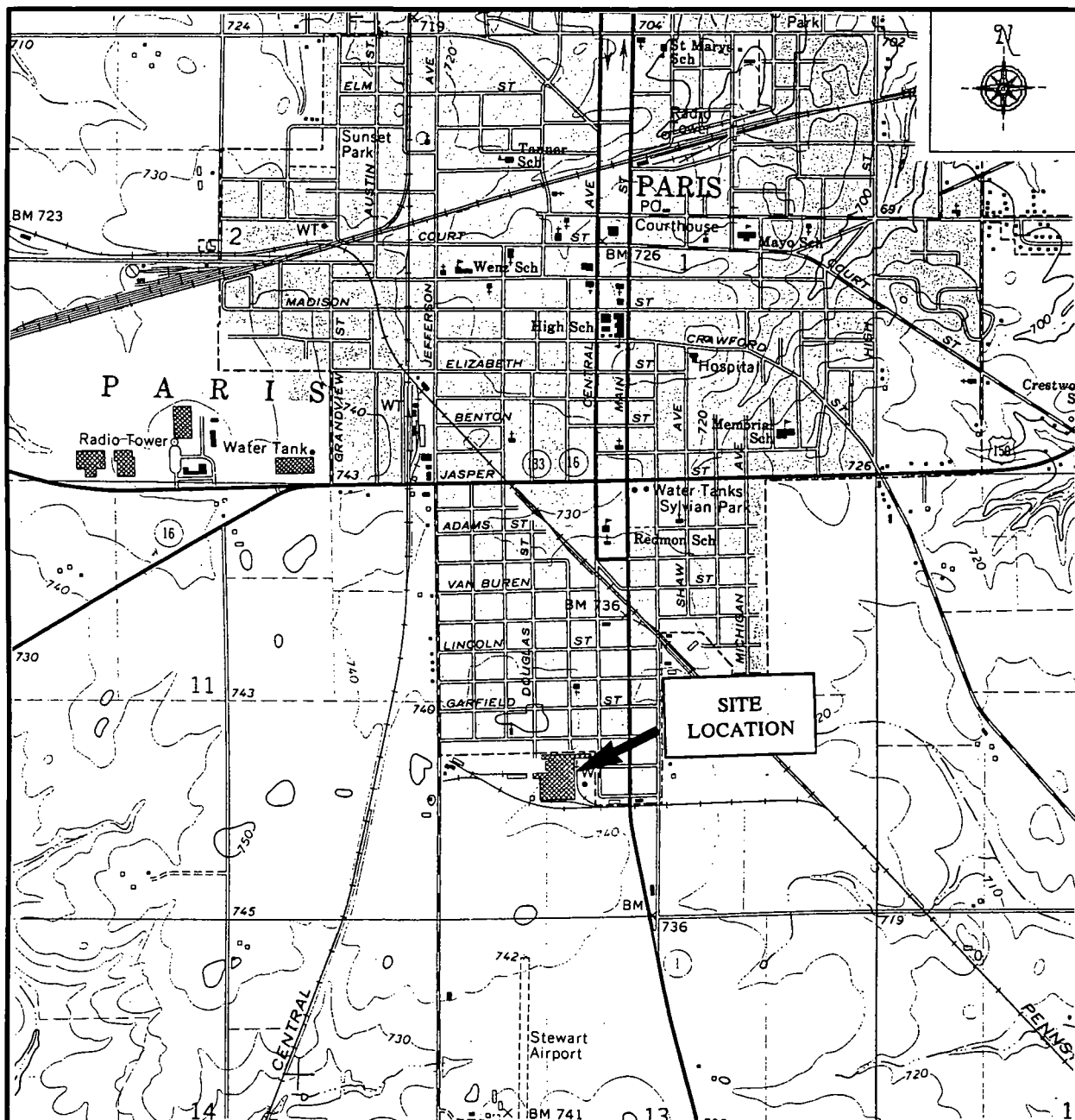
The mobilization of a pug-mill to mix paint contaminated material with excavated soil may have reduced costs associated with disposal. The process may have enabled all the waste to be profiled as non-hazardous material which could have decreased disposal costs. However, the use of a pug-mill may have increased costs by increasing the amount of time to complete the removal.

C. Recommendations for New Policy or Regulations, and Changes in Current Regulations and Response Plans

None.

Attachment A

Figures

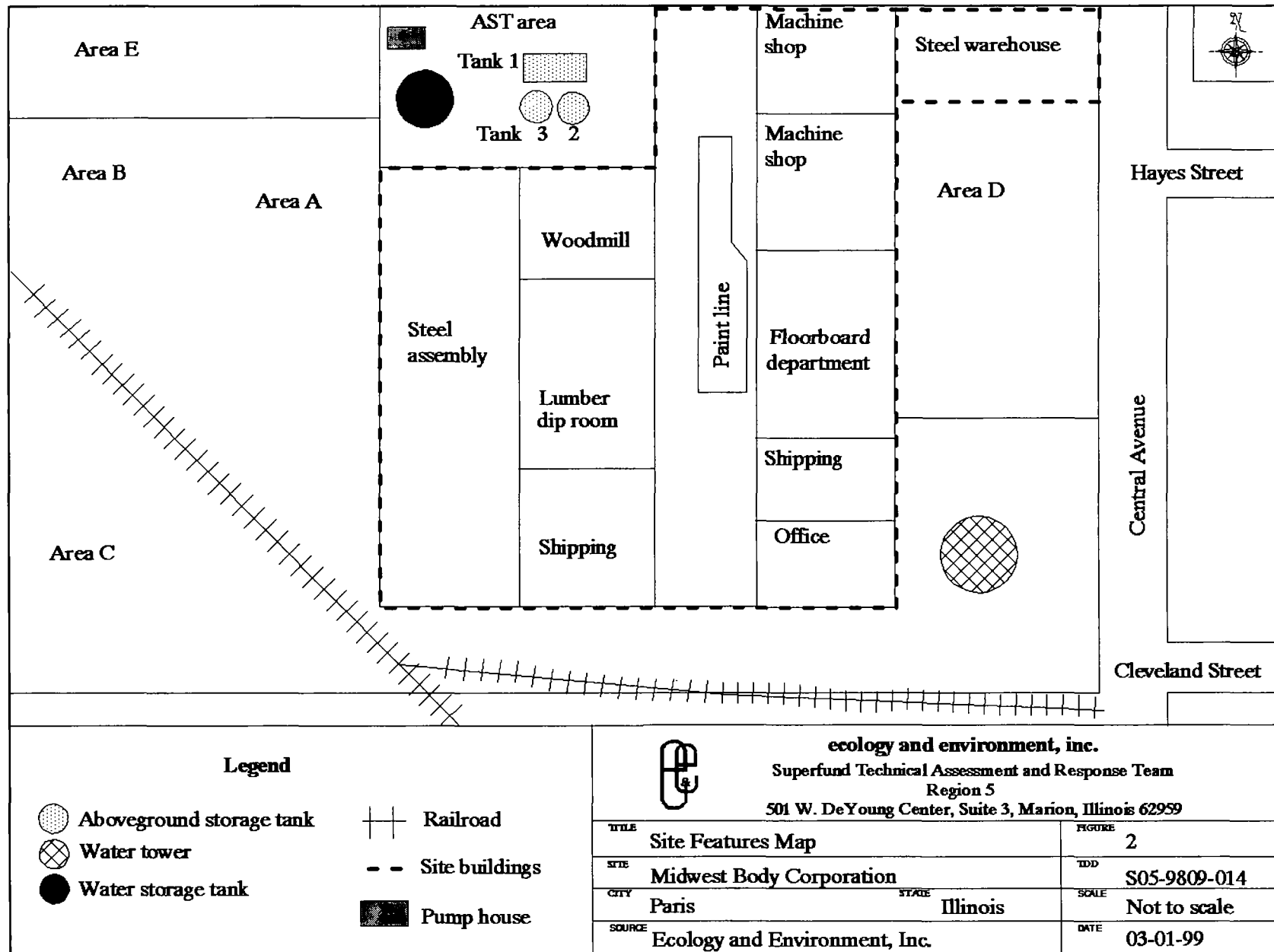


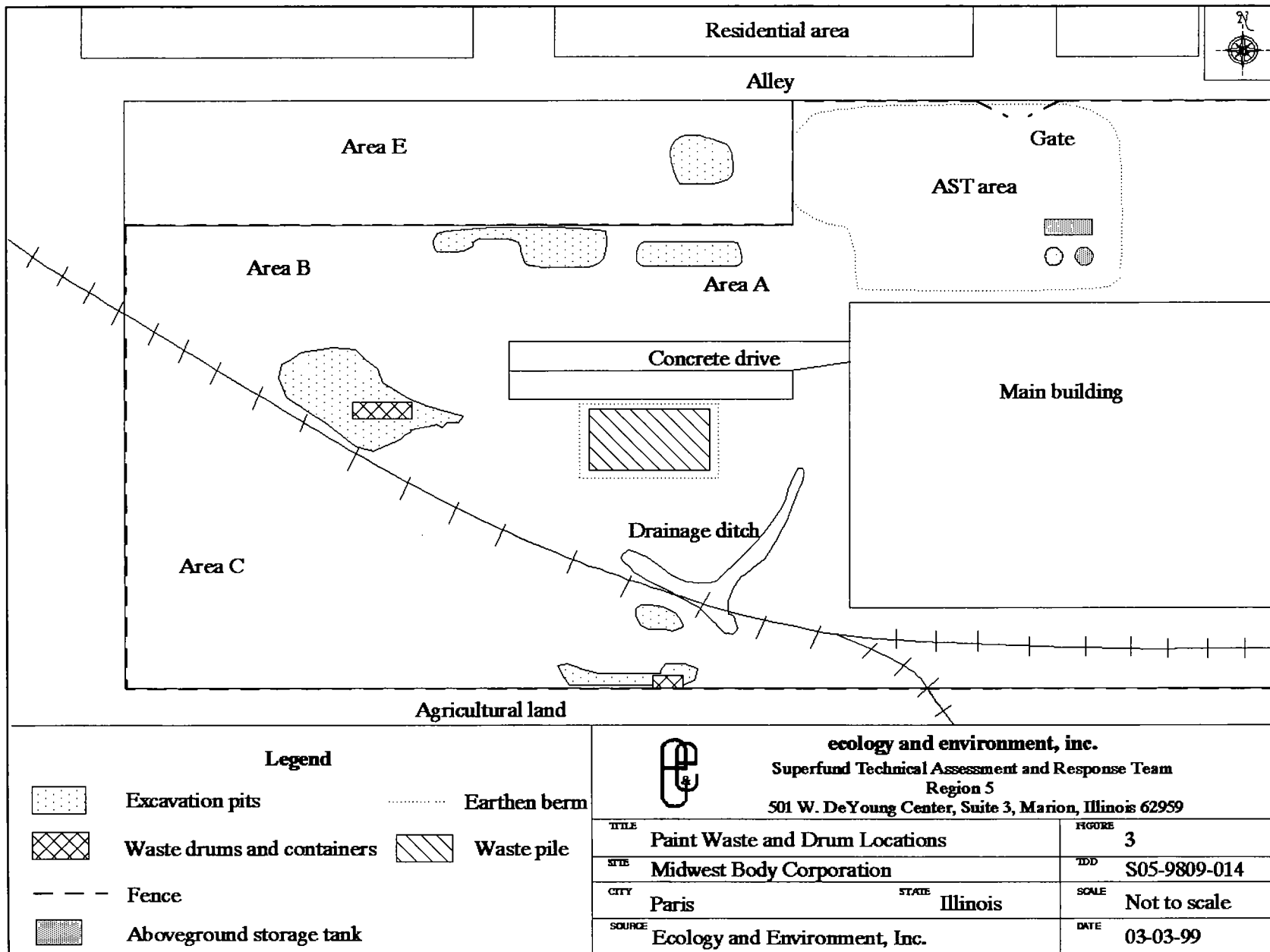
Quadrangle Location

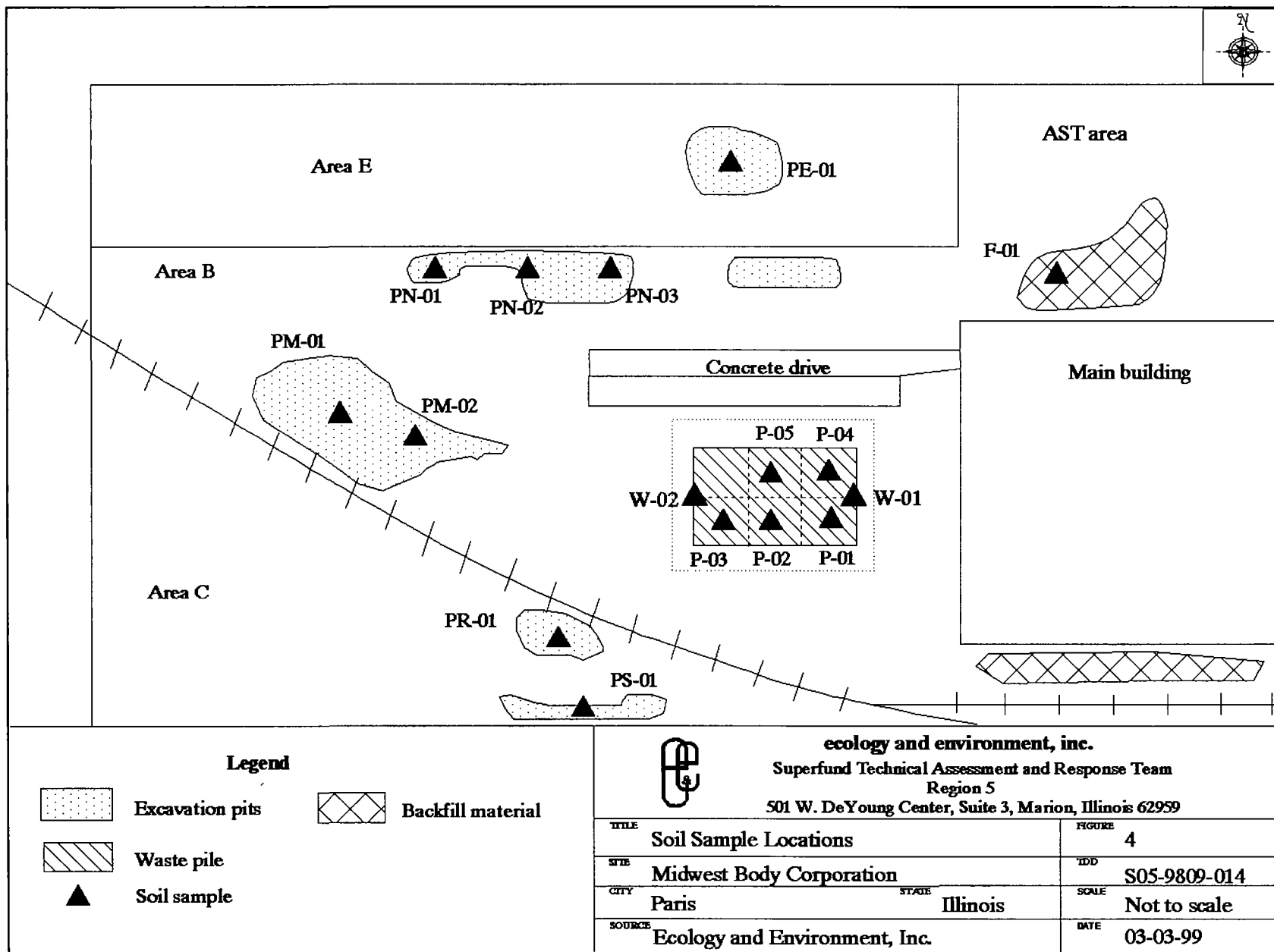


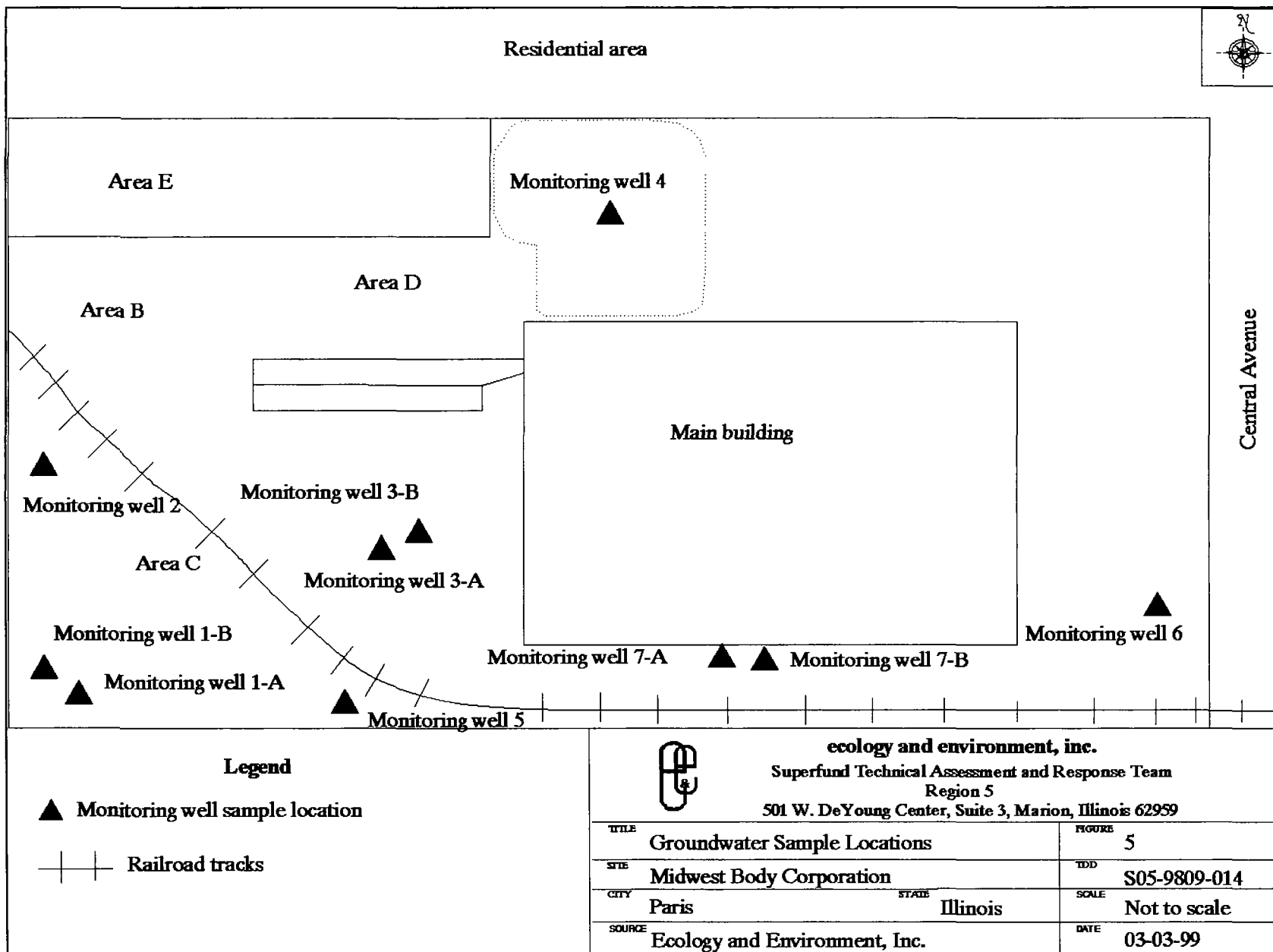
ecology and environment, inc.
Superfund Technical Assessment and Response Team
Region 5
 501 W. DeYoung Center, Suite 3, Marion, Illinois 62959

TITLE	Site Location Map	FIGURE	1
STB	Midwest Body Corporation	SCALE	1:24,000
QTY	Paris	STATE	Illinois
SOURCE	U.S.G.S. 7.5 Minute Topographic Series, Paris South Quadrangle	TDD	S05-9809-014
		DATE	1966
		REVISED	N/A









Attachment B

Tables

<p align="center">Table 1</p> <p align="center">ORGANIZATION OF RESPONSE</p> <p align="center">MIDWEST BODY CORPORATION</p> <p align="center">PARIS, EDGAR COUNTY, ILLINOIS</p> <p align="center">SEPTEMBER 29, 1998 - NOVEMBER 13, 1998</p>		
Agencies or Parties Involved	Contact	Description of Participation
U.S. EPA Region 5 8588 Rt. 148 Marion, Illinois 62959 (618) 997-0115	Kevin Turner	Federal OSC responsible for overall response oversight and control.
U.S. EPA Region 5 Enforcement Section 77 West Jackson Boulevard Chicago, Illinois 60604	William Messenger, Chief	Issued written Notice Letters and Request for Information Letters to potentially responsible parties.
U.S. EPA Region 5 Emergency Response Branch 77 West Jackson Boulevard Chicago, Illinois, 60604	Rick Karl, Chief	Facilitated approval process for Action Memoranda.
Illinois EPA 1001 North Grand Ave. East Springfield, Illinois, 62794	Mark Densmore	Provided historical information on the site.
Ecology and Environment, Inc. Superfund Technical Assessment and Response Team 501 W. DeYoung Center, Suite 3 Marion, Illinois 62959 (618) 998-8010	Paul Atkociunas	Provided U.S. EPA with technical assistance, administrative support, site documentation, and assisted in final report preparation.
City of Paris Fire Department 213 W. Washington Street Paris, Illinois, 61944	Hermann Taylor	Assisted in site demobilization.
Earth Tech, Inc. 2229 Tomlynn Street Richmond, Virginia 23230 (804) 358-5858	Brett Vanness Robert Koentop Michael Kinder Martin Blum	Provided personnel and equipment for removal work. Arranged for laboratory services and the disposal of site waste.

<p align="center">Table 2</p> <p align="center">SAMPLE LOCATIONS</p> <p align="center">MIDWEST BODY CORPORATION</p> <p align="center">PARIS, EDGAR COUNTY, ILLINOIS</p>			
Sample Number	Date	Location	Comment
W-01	10/09/98	East half of excavation pile	Surface, hot sample (paint waste)
W-02	10/09/98	West half of excavation pile	Surface, hot sample (paint waste)
P-01	10/09/98	Southeast quad of excavation pile	Surface, systematic grid
P-02	10/09/98	Central quad of excavation pile	Surface, systematic grid
P-03	10/09/98	Northeast quad of excavation pile	Surface, systematic grid
P-04	10/09/98	Northwest quad of excavation pile	Surface, systematic grid
P-05	10/09/98	Southwest quad of excavation pile	Surface, systematic grid
F-01	10/09/98	Backfill material north of main building	Surface, systematic grid
PN-01	10/13/98	West quad of pit south of north fence	Surface, systematic grid
PN-02	10/13/98	Center quad of pit south of north fence	Surface, systematic grid
PN-03	10/13/98	East quad of pit south of north fence	Surface, systematic grid
PM-01	10/13/98	East quad of main pit	Surface, systematic grid
PM-02	10/13/98	West quad of main pit	Surface, systematic grid
PS-01	10/16/98	Pit north of south fence	Surface, systematic grid
PR-01	10/16/98	Pit south of railroad tracks	Surface, systematic grid
PE-01	10/20/98	Pit north of north fence	Surface, systematic grid
MW-01A	10/27/98	Monitoring well 01	Shallow well
MW-01B	10/27/98	Monitoring well 01B	Deep well
MW-02	10/27/98	Monitoring well 02	Shallow well
MW-03A	10/28/98	Monitoring well 03A	Shallow well
MW-03B	10/28/98	Monitoring well 03B	Deep well
MW-04	10/27/98	Monitoring well 04	Shallow well
MW-05	10/27/98	Monitoring well 05	Shallow well
MW-06	10/28/98	Monitoring well 06	Shallow well
MW-07A	10/28/98	Monitoring well 07A	Shallow well
MW-07B	10/28/98	Monitoring well 07B	Deep well

Table 3

**SOIL SAMPLING RESULTS
MIDWEST BODY CORPORATION
PARIS, EDGAR COUNTY, ILLINOIS**

Parameter	Sample Designation/Matrix				
	P-01/ Solid	P-02/ Solid	P-03/ Solid	P-04/ Solid	P-05/ Solid
Total Volatile Organic Compounds ($\mu\text{g}/\text{kg}$)					
Ethylbenzene	16.3	11.7	14.4	< 5	824
Toluene	13.9	31	42.1	19.3	597
Total xylenes	172	396	301	< 10	16,000
TCLP Volatile Organic Compounds (mg/L)					
Tetrachloroethene	< 0.02	< 0.02	< 0.02	< 0.02	0.037
Total Metals (mg/kg)					
Barium	74.6	179	75.1	76.1	152
Cadmium	0.496	0.642	0.581	< 0.23	1.1
Chromium	43.3	69.4	34.1	34.1	69.7
Copper	28.7	44.6	25.2	29.2	38.5
Lead	267	605	298	255	850
Selenium	0.041	< 0.04	< 0.04	< 0.04	< 0.04
Zinc	102	306	87.9	96.4	309
TCLP Metals (mg/L)					
Barium	3.4	4.8	7.69	5.45	7.29
Cadmium	0.012	0.014	0.014	< 0.005	0.012
Chromium	< 0.0002	< 0.0002	< 0.0002	0.0025	0.0211
Copper	0.042	< 0.004	0.073	0.054	0.061
Lead	0.116	0.41	< 0.0004	0.249	0.322
Zinc	3.42	7.52	5.11	5.89	8.86
Total Semivolatile Organic Compounds ($\mu\text{g}/\text{kg}$)					
Benzo(a)anthracene	< 330	380	< 330	< 330	< 330
Benzo(b)fluoranthene	< 330	380	< 330	< 330	< 330
Benzo(k)fluoranthene	< 330	610	500	< 330	< 330
Benzo(g,h,i)perylene	< 330	330	< 330	< 330	< 330
Benzo(a)pyrene	< 330	430	< 330	< 330	< 330
Bis(2-ethylhexyl)phthalate	< 330	1,040	< 330	< 330	< 330
Chrysene	< 330	430	400	< 330	< 330
Dibenzofuran	< 330	< 330	< 330	< 330	< 330
Di-N-butylphthalate	< 330	< 330	< 330	< 330	< 330
Fluoranthene	< 330	850	< 330	< 330	300
Naphthalene	< 330	350	440	< 330	< 330
Phenanthrene	< 330	590	< 330	< 330	< 330
Pyrene	< 330	1,180	420	< 330	440
pH (standard units)	8.4	8.78	9.33	7.4	7.16
Flash point	> 180°F	> 180°F	> 180°F	> 180°F	> 180°F
Paint filter test	Pass	Pass	Pass	Pass	Pass

Key:

TCLP = Toxicity characteristic leaching procedure.

 $\mu\text{g}/\text{kg}$ = Micrograms per kilogram.

mg/L = Milligrams per liter.

mg/kg = Milligrams per kilogram.

< = Less than.

> = Greater than.

°F = Degrees Fahrenheit.

Source:

American Environmental Analytical Laboratories, Chicago, Illinois. Analytical provided through Earth Tech, Incorporated.

Table 4

**SOIL SAMPLING RESULTS
MIDWEST BODY CORPORATION
PARIS, EDGAR COUNTY, ILLINOIS**

Parameter	Sample Designation/Matrix										
	W-01/ Solid	W-02/ Solid	F-01/ Solid	PN-01/ Solid	PN-02/ Solid	PN-03/ Solid	PM-01/ Solid	PM-02/ Solid	PS-01/ Solid	PR-01/ Solid	PE-01/ Solid
Total Volatile Organic Compounds (µg/kg)											
Benzene	405	324	<10	<10	<10	<10	<10	<10	<10	<10	<10
n-Butylbenzene	7460	14600	<10	26.6	<10	<10	<10	<10	<10	<10	<10
sec-Butylbenzene	3000	5660	<10	<10	<10	<10	<10	<10	<10	<10	<10
tert-Butylbenzene	1150	7280	<10	22.8	<10	<10	<10	<10	<10	<10	<10
cis-1,2-Dichloroethene	22.9	18.4	<10	<10	<10	<10	<10	<10	<10	<10	<10
Ethyl benzene	24600	167000J	50	135	<10	<10	<10	<10	<10	<10	<10
Methylene chloride	163	141	18.3	81.4	<10	<10	<10	<10	<10	<10	<10
Tetrachloroethene	3530	307	<20	<20	<20	<20	<20	<20	<20	<20	<20
Toluene	49600J	170000J	178	91.8	<10	<10	<10	<10	<10	<10	<10
1,2,4-Trimethylbenzene	34900	72700J	14.1	189	<10	<10	<10	<10	<10	<10	<10
1,3,5-Trimethylbenzene	20500	26400	22.9	80	<10	<10	<10	<10	<10	<10	<10
Isopropylbenzene	5900	12100	<10	16.6	<10	<10	<10	<10	<10	<10	<10
p-Isopropyltoluene	4820	9430	<10	35.4	<10	<10	<10	<10	<10	<10	<10
n-Propylbenzene	7910	25000	<10	31.9	<10	<10	<10	<10	<10	<10	<10
Naphthalene	8850	3470	<10	18.4	<10	<10	<10	<10	<10	<10	<10
Total Xylenes	114000	356000J	204	2870	<10	<10	<10	<10	<10	<10	<10
Total Metals (mg/kg)											
Arsenic	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04	14.2	<0.04	<0.04	<0.04	<0.04
Barium	1080	402	2.69	52	140	46.9	108	102	98.2	134	<0.6
Cadmium	1.31	1.86	<0.23	0.709	<0.23	<0.23	0.736	0.832	0.42	0.591	1
Chromium	5610	1550	8.48	16.7	22.6	11.5	22	30.4	32.03	24.1	20
Copper	10.6	10.8	17.5	NA	NA	NA	NA	NA	NA	28.8	NA
Lead	33000	10800	8.26	98.5	249	93.5	260	459	290	0.02	197.8
Selenium	3.26	0.27	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04	<0.04	0.04	<0.04
Zinc	3220	1720	34.5	NA	NA	NA	NA	NA	160	0.014	NA

Table 4 (cont.)

**SOIL SAMPLING RESULTS
MIDWEST BODY CORPORATION
PARIS, EDGAR COUNTY, ILLINOIS**

Parameter	Sample Designation/Matrix										
	W-01/ Solid	W-02/ Solid	F-01/ Solid	PN-01/ Solid	PN-02/ Solid	PN-03/ Solid	PM-01/ Solid	PM-02/ Solid	PS-01/ Solid	PR-01/ Solid	PE-01/ Solid
TCLP Metals (mg/L)											
Barium	5.98	5.72	NA	6.54	4.69	0.09	0.038	0.0731	1.01	2.59	<0.011
Cadmium	0.012	0.01	NA	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005	<0.005
Chromium	0.098	<0.0002	NA	0.177	0.253	0.0733	0.26	1.16	<0.0002	<0.0002	0.006
Copper	0.079	0.078	NA	NA	NA	NA	NA	NA	0.123	0.068	NA
Lead	2.48	5.17	NA	<0.0004	<0.0004	<0.0004	0.066	0.418	<0.0004	<0.0004	0.097
Zinc	14.1	9.61	NA	NA	NA	NA	NA	NA	<0.0003	1.33	<0.0003
Total Semivolatile Organic Compounds (µg/kg)											
Acenaphthene	<330	440	NA	<330	1350	<330	<330	<330	<330	<330	<330
Acenaphthylene	1,050	<330	NA	<330	2290	<330	<330	<330	<330	<330	<330
Anthracene	500	600	NA	<330	7550	430	<330	<330	<330	<330	<330
Benzo(a)anthracene	<330	360	NA	<330	12500	1,100	<330	<330	<330	<330	<330
Benzo(b)fluoranthene	<330	<330	NA	<330	10500	1050	<330	<330	<330	<330	<330
Benzo(k)fluoranthene	<330	510	NA	<330	9060	1650	<330	<330	<330	<330	<330
Benzo(g,h,i)perylene	<330	540	NA	<330	6530	820	<330	<330	<330	<330	<330
Benzo(a)pyrene	<330	500	NA	<330	11700	1500	<330	<330	<330	<330	<330
Bis(2-ethylhexyl)phthalate	1,780	6500	NA	<330	<330	<330	<330	<330	<330	<330	<330
Butylbenzylphthalate	5,280	2000	NA	<330	<330	<330	<330	<330	<330	<330	<330
Chrysene	<330	380	NA	<330	13500	1350	<330	<330	<330	<330	<330
Dibenz(a,h)anthracene	<330	<330	NA	<330	1520	<330	<330	<330	<330	<330	<330
Dibenzofuran	<330	1400	NA	<330	2070	<330	<330	<330	<330	<330	<330
Di-N-butylphthalate	1,050,000J	8000	NA	<330	<330	<330	<330	<330	<330	<330	<330
Diethylphthalate	900	<330	NA	<330	<330	<330	<330	<330	<330	<330	<330
Fluoranthene	410	650	NA	<330	32900	2680	<330	<330	<330	<330	<330
Fluorene	<330	1000	NA	<330	3020	<330	<330	<330	<330	<330	<330
Indeno(1,2,3-cd)pyrene	<330	<330	NA	<330	3860	460	<330	<330	<330	<330	<330
2-Methylnaphthalene	6,810	14000	NA	<330	830	<330	<330	<330	<330	<330	<330
Naphthalene	156,000	43000	NA	<330	1070	<330	<330	<330	<330	<330	<330
Phenanthrene	2,540	2900	NA	<330	33700	1610	<330	<330	<330	<330	<330
Pyrene	560	830	NA	430	53000	3740	<330	<330	<330	<330	<330

Table 4 (cont.)

**SOIL SAMPLING RESULTS
MIDWEST BODY CORPORATION
PARIS, EDGAR COUNTY, ILLINOIS**

Parameter	Sample Designation/Matrix										
	W-01/ Solid	W-02/ Solid	F-01/ Solid	PN-01/ Solid	PN-02/ Solid	PN-03/ Solid	PM-01/ Solid	PM-02/ Solid	PS-01/ Solid	PR-01/ Solid	PE-01/ Solid
TCLP Semivolatile Organic Compounds (mg/L)											
m-p-cresol	<0.02	1.32	NA	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02
cresol	<0.02	1.32	NA	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02	<0.02

Key:

TCLP =Toxicity characteristic leaching procedure.

 $\mu\text{g/kg}$ =Micrograms per kilogram.

mg/L =Milligrams per liter.

< =Less than.

NA =Not analyzed.

J =Estimated concentration.

Source:

American Environmental Analytical Laboratories, Chicago, Illinois. Analytical provided through Earth Tech, Incorporated.

<p style="text-align: center;">Table 5</p> <p style="text-align: center;">MONITORING WELL INFORMATION MIDWEST BODY CORPORATION PARIS, EDGAR COUNTY, ILLINOIS</p>				
Well ID Number	Name	Total Depth (below surface)*	Water level (below surface)*	Screen Interval (below surface)**
MW-01A	Monitoring well 01	14.5 feet	3.0 feet	4 to 14.5 feet
MW-01B	Monitoring well 01B	40.5 feet	6.33 feet	29 to 41 feet
MW-02	Monitoring well 02	14.67 feet	3.5 feet	4 to 15 feet
MW-03A	Monitoring well 03A	15.33 feet	6.0 feet	4 to 14.5 feet
MW-03B	Monitoring well 03B	40 feet	7.0 feet	29 to 41 feet
MW-04	Monitoring well 04	15 feet	5.0 feet	4 to 14.5 feet
MW-05	Monitoring well 05	15.17 feet	5.0 feet	4 to 15 feet
MW-06	Monitoring well 06	14.5 feet	5.167 feet	4 to 15 feet
MW-07A	Monitoring well 07A	17 feet	5.0 feet	6.5 to 17 feet
MW-07B	Monitoring well 07B	38 feet	7.5 feet	27.5 to 38 feet

Source:

* =START logbook.

** =Illinois Environmental Protection Agency, Remedial Investigation Report for Midwest Body Corporation.

TABLE 6										
GROUNDWATER SAMPLING RESULTS MIDWEST BODY CORPORATION PARIS, EDGAR COUNTY, ILLINOIS										
Parameter	Sample Designation/Matrix									
	MW-01A/ Liquid	MW-01B/ Liquid	MW-02/ Liquid	MW-03A/ Liquid	MW-03B/ Liquid	MW-04/ Liquid	MW-05/ Liquid	MW-06/ Liquid	MW-07A/ Liquid	MW-07B/ Liquid
Target Analyte List Metals (mg/L)										
Aluminum	<0.0291	1.19	0.882	<0.0291	<0.0291	0.38	1.74	<0.0291	<0.0291	<0.0291
Arsenic	<0.0008	<0.0008	0.206	<0.0008	<0.0008	<0.0008	<0.0008	<0.0008	<0.0008	<0.0008
Barium	<0.0111	0.154	0.0672	0.057	0.087	0.123	<0.0111	0.036	0.078	0.059
Calcium	57.4	36.9	4.3	<0.3205	<0.3205	47.4	49.5	<0.3205	<0.3205	<0.3205
Chromium	0.007	0.002	<0.0002	0.0007	<0.0002	<0.0002	0.01	<0.0002	<0.0002	<0.0002
Copper	0.06	0.049	0.0364	0.068	0.064	0.036	0.03	0.038	0.041	0.045
Iron	0.63	1.16	0.462	0.46	0.21	0.789	1.11	0.63	0.6	3.82
Lead	<0.0004	0.093	<0.0004	<0.0004	0.025	0.022	<0.0004	<0.0004	<0.0004	<0.0004
Magnesium	10.5	8.14	9.63	<0.004	<0.004	7.56	9.59	<0.004	<0.004	<0.004
Manganese	0.36	0.74	0.568	0.28	0.29	1.15	0.19	0.7	0.42	0.61
Nickel	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	<0.0003	0.006	<0.0003	<0.0003	<0.0003
Potassium	<0.003	2.74	22.3	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003
Sodium	15.1	25.7	49.4	<0.0354	<0.0354	10.6	23.6	<0.0354	<0.0354	<0.0354
Cyanide (mg/L)	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03	<0.03
Sulfide (mg/L)	<1	<1	<1	<1	<1	<1	<1	<1	<1	<1
pH (standard units)	7.32	7.41	7.24	6.75	6.91	6.83	7.13	7.07	7.01	7.02

Key:

mg/L = Milligrams per liter.
 ND = Not detected.
 < = Less than.

Source:

American Environmental Analytical Laboratories, Chicago, Illinois. Analysis provided by Earth Tech, Incorporated.

Table 7

**WASTE DISPOSAL SUMMARY
MIDWEST BODY CORPORATION
PARIS, EDGAR COUNTY, ILLINOIS**

Waste Description	Quantity	Date Shipped	Manifest Number	Disposal Method
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/28/98	MI4322190	Treatment and landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/28/98	MI4322189	Treatment and landfill
Nonhazardous soil	95 tons	10/28/98	MI4322135	Landfill
Nonhazardous soil	95 tons	10/28/98	MI4322136	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/28/98	MI4322192	Treatment and landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/28/98	MI4322193	Treatment and landfill
Nonhazardous soil	95 tons	10/28/98	MI4322137	Landfill
Nonhazardous soil	95 tons	10/28/98	MI4322138	Landfill
Nonhazardous soil	95 tons	10/28/98	MI4322139	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/28/98	MI4322194	Treatment and landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/28/98	MI4322200	Treatment and landfill
Nonhazardous soil	95 tons	10/28/98	MI4322140	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/30/98	MI4322199	Treatment and landfill
Nonhazardous soil	95 tons	10/30/98	MI4322141	Landfill
Nonhazardous soil	95 tons	10/30/98	MI4322142	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/30/98	MI4322198	Treatment and landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/30/98	MI4322197	Treatment and landfill
Nonhazardous soil	95 tons	10/30/98	MI4322143	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/30/98	MI4322204	Treatment and landfill
Nonhazardous soil	95 tons	10/30/98	MI4322144	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	10/30/98	MI4322182	Treatment and landfill
Nonhazardous soil	95 tons	10/30/98	MI4322145	Landfill
Nonhazardous soil	95 tons	10/30/98	MI4322146	Landfill
Nonhazardous soil	95 tons	10/30/98	MI4322147	Landfill
Nonhazardous soil	95 tons	11/02/98	MI4322150	Landfill
Nonhazardous soil	95 tons	11/02/98	MI4322149	Landfill
Nonhazardous soil	95 tons	11/02/98	MI4322148	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	11/02/98	MI4322186	Treatment and landfill
Nonhazardous soil	95 tons	11/02/98	MI4322151	Landfill
Nonhazardous soil	95 tons	11/02/98	MI4322152	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	11/02/98	MI4322187	Treatment and landfill
Nonhazardous soil	95 tons	11/02/98	MI4322154	Landfill
Nonhazardous soil	95 tons	11/02/98	MI4322155	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	11/02/98	MI4322185	Treatment and landfill
Nonhazardous soil	95 tons	11/02/98	MI4322157	Landfill
RQ, Hazardous waste solid, n.o.s., (lead)	95 tons	11/02/98	MI4322188	Treatment and landfill
Nonhazardous soil	95 tons	11/04/98	MI4322158	Landfill
Nonhazardous soil	95 tons	11/04/98	MI4322159	Landfill
Nonhazardous soil	95 tons	11/04/98	MI4322160	Landfill
Nonhazardous soil	95 tons	11/04/98	MI4322161	Landfill
Nonhazardous soil	95 tons	11/06/98	MI4322162	Landfill
Nonhazardous soil	95 tons	11/06/98	MI4322184	Landfill

Key:

RQ =Reportable quantity.
n.o.s. =Not otherwise specified.

Source:

Waste Manifests from MBC removal.

Attachment C

Photodocumentation



SITE: Midwest Body Corp

DATE: September 30, 1998

TIME: 1015

LOCATION: Paris, IL

DIRECTION: Southwest

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Area B, after clearing activities, looking from the concrete drive.



SITE: Midwest Body Corp

DATE: September 30, 1998

TIME: 1015

LOCATION: Paris, IL

DIRECTION: West

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Area B, after clearing activities, looking from the concrete drive.



SITE: Midwest Body Corp

DATE: October 5, 1998

TIME: 1505

LOCATION: Paris, IL

DIRECTION: Southeast

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Main excavation pit in Area B; note the puddled water.



SITE: Midwest Body Corp

DATE: October 5, 1998

TIME: 1730

LOCATION: Paris, IL

DIRECTION: N/A

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Contaminated material in bucket; note amount of paint material.



SITE: Midwest Body Corp

DATE: October 1, 1998

TIME: 1754

LOCATION: Paris, IL

DIRECTION: N/A

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Pile of contaminated material in main excavation pit in Area B.



SITE: Midwest Body Corp

DATE: October 5, 1998

TIME: 1500

LOCATION: Paris, IL

DIRECTION: N/A

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Pails and paint material on the surface before excavation activities in Area B.



SITE: Midwest Body Corp

DATE: October 12, 1998

TIME: 1620

LOCATION: Paris, IL

DIRECTION: South

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Excavated drums staged on the west end of the concrete drive.



SITE: Midwest Body Corp

DATE: October 20, 1998

TIME: 1517

LOCATION: Paris, IL

DIRECTION: West

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Excavation pit in Area E.



SITE: Midwest Body Corp

DATE: October 26, 1998

TIME: 1120

LOCATION: Paris, IL

DIRECTION: South

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Pile of contaminated material staged in earthen berm before loading activities.



SITE: Midwest Body Corp

DATE: October 26, 1998

TIME: 1125

LOCATION: Paris, IL

DIRECTION: East

PHOTOGRAPHER: P. Atkociunas

SUBJECT: ERRS loading contaminated material into gondola rail cars.



SITE: Midwest Body Corp

DATE: October 29, 1998

TIME: 1025

LOCATION: Paris, IL

DIRECTION: South

PHOTOGRAPHER: P. Atkociunas

SUBJECT: ERRS using rubber tire loader to move rail cars.



SITE: Midwest Body Corp

DATE: October 29, 1998

TIME: 1625

LOCATION: Paris, IL

DIRECTION: Southeast

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Backfill material located on site north of main building.



SITE: Midwest Body Corp

DATE: November 4, 1998

TIME: 1000

LOCATION: Paris, IL

DIRECTION: South

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Site conditions in Area B after rain event.



SITE: Midwest Body Corp

DATE: November 9, 1998

TIME: 1125

LOCATION: Paris, IL

DIRECTION: West

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Area E after backfill activities.



SITE: Midwest Body Corp

DATE: November 10, 1998

TIME: 1200

LOCATION: Paris, IL

DIRECTION: West

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Area B after backfill activities.



SITE: Midwest Body Corp

DATE: November 10, 1998

TIME: 1215

LOCATION: Paris, IL

DIRECTION: North

PHOTOGRAPHER: P. Atkociunas

SUBJECT: Area B - area where contaminated material was staged.